

JUL 1 1 2014:

Christopher DeLacy Holland & Knight 800 17th Street, N.W. Suite 1100 Washington, D.C. 20006

RE: MUR 6734

Amy Goldman Fowler

Dear Mr. DeLacy:

On May 14, 2013, the Federal Election Commission notified your client, Amy Goldman Fowler, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your client at that time.

Upon further review of this matter, including the recent Supreme Court decision in *FEC* v. *McCutcheon*, the Commission, on July 2, 2014, voted to dismiss this matter. The Factual and Legal Analysis, which explains the Commission's decision, is enclosed for your information.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009).

If you have any questions, please contact Elena Paoli, the attorney assigned to this matter, at (202) 694-1548.

Sincerely,

Mark Allen

Acting Assistant General Counsel

Enclosure: Factual and Legal Analysis

1	FEDERAL ELECTION COMMISSION			
2	FACTUAL AND LEGAL ANALYSIS			
4				
5		RESPONDENTS:	MUR: 6734	
6 7		John Canning	Vincent Mai	
8		Jeffrey Hurt	Prem Reddy	
9		Donald Simms	Robert Beal	
10		Susan Simms	Richard Uihlein	
11		David Wallace	Philip Geier	
12		Robert Reynolds	L. Scott Frantz	
13		David Boies	John Cooney	
14		Thomas Cushman	Elizabeth Wiskemann	
15		Joe Murphy	Edward Donaghy	
16		Thomas Fay	Michael Keiser	
17		Thomas Girardi	John Roeser	
18 1		Amy Goldman	Josephine Freede	
19		John Harris	Don Scifres	
20		David Herro	Timothy Travis	
21		Carl A. Davis	William Smithburg	
22		Kurt Wheeler	Alan Sieroty	
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24	_	THE OPTION	·	
25	I.	INTRODUCTION		
26		This matter was generated by a co	implaint filed with the Federal Election Commission	
27	("Con	"Commission") by Citizens for Responsibility and Ethics in Washington and Melanie Sloan		
28	("CREW") and the Campaign Legal Center and Paul S. Ryan ("CLC") alleging that 32			
29	individuals violated 2 U.S.C. § 441a(a)(3)(A) and 11 C.F.R. § 110.5(b)(1)(i) by exceeding the			
30	\$42,600 aggregate biennial limit for contributions to candidate committees during the 2012			
31	electio	election cycle.		
32	II.	FACTUAL AND LEGAL ANA	LYSIS	
33		The Act and Commission regulations set biennial limits on the aggregate amount that a		
34	individual may contribute to all authorized candidate committees during each two-year period			
35	beginning on January 1 of an odd-numbered year and ending on December 31 of the next even			

numbered year. 2 U.S.C. § 441a(a)(3)(A); 11 C.F.R. § 110.5(b)(1)(i).

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- On April 2, 2014, the Supreme Court invalidated 2 U.S.C. § 441a(a)(3), holding that the
- 2 aggregate biennial contribution limits do not further the government's interest in preventing
- actual or apparent quid pro quo corruption. FEC v. McCutcheon, 134 S. Ct. 1434 (2014).
- 4 Accordingly, we dismiss the complaint and close the file.